

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESALE PRICE  
LITIGATION

MDL No. 1456

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Master File No. 01-CV-12257-PBS

Judge Patti B. Saris

**CORRECTED DECLARATION OF EARL W. SEYMOUR**

I, Earl W. Seymour, pursuant to 28 U.S.C. §1746, on oath, depose and state as follows:

1. I am a resident of the State of Iowa and Chairman of the Board of Trustees for Pirelli Armstrong Tire Corporation Retiree Medical Benefits Trust ("the Trust"). I have personal knowledge of the facts stated below and will testify in court to the same if called upon to do so.

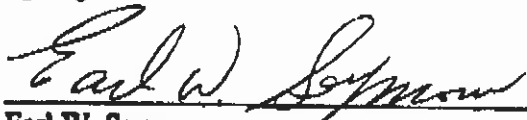
2. On December 15, 2010, I submitted a Declaration to itemize the time I spent assisting attorneys for the Trust and class counsel with prosecuting claims against AstraZeneca ("AZ") and the other Defendants in this litigation.

3. I recently became aware of an error in the addition of the total hours set out in my Declaration, and hereby submit this Corrected Declaration solely to correct that mathematical error.

4. Specifically, rather than 43.5 hours, the total number of hours spent by the Trust and detailed in my Declaration of December 15, 2010 is 50.5. At the rate of \$100.00 per hour, the value of this time is equal to \$5,050.00, not \$4,350.00, as reflected in my prior Declaration..

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 7, 2011

  
Earl W. Seymour

**CERTIFICATE OF SERVICE BY LEXISNEXIS FILE & SERVE**

*In re Pharmaceutical Industry Average Wholesale Price Litigation*  
Master Case No. 01-cv-12257, MDL 1456

I, Kenneth A. Wexler, hereby certify that I am one of Class Plaintiffs' attorneys and that, on February 7, 2011, I caused a copy of *the Corrected Declaration of Earl W. Seymour* to be served on all counsel of record by causing same to be posted electronically via Lexis-Nexis File & Serve.

/s/Kenneth A. Wexler  
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